



# New EPA QA Guidance for Quality Management and QA Project Plans

**Kelly Black**

**Neptune & Company, Inc.**



**March 28 – April 1, 2011  
Arlington, VA**

Report Documentation Page				Form Approved OMB No. 0704-0188	
Public reporting burden for the collection of information is estimated to average 1 hour per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to Washington Headquarters Services, Directorate for Information Operations and Reports, 1215 Jefferson Davis Highway, Suite 1204, Arlington VA 22202-4302. Respondents should be aware that notwithstanding any other provision of law, no person shall be subject to a penalty for failing to comply with a collection of information if it does not display a currently valid OMB control number.					
1. REPORT DATE <b>28 MAR 2011</b>		2. REPORT TYPE		3. DATES COVERED <b>00-00-2011 to 00-00-2011</b>	
4. TITLE AND SUBTITLE <b>New EPA QA Guidance for Quality Management and QA Project Plans</b>				5a. CONTRACT NUMBER	
				5b. GRANT NUMBER	
				5c. PROGRAM ELEMENT NUMBER	
6. AUTHOR(S)				5d. PROJECT NUMBER	
				5e. TASK NUMBER	
				5f. WORK UNIT NUMBER	
7. PERFORMING ORGANIZATION NAME(S) AND ADDRESS(ES) <b>Neptune &amp; Company, Inc.,1505 15th St., Suite B,Los Alamos,NM,87544-3063</b>				8. PERFORMING ORGANIZATION REPORT NUMBER	
9. SPONSORING/MONITORING AGENCY NAME(S) AND ADDRESS(ES)				10. SPONSOR/MONITOR'S ACRONYM(S)	
				11. SPONSOR/MONITOR'S REPORT NUMBER(S)	
12. DISTRIBUTION/AVAILABILITY STATEMENT <b>Approved for public release; distribution unlimited</b>					
13. SUPPLEMENTARY NOTES <b>Presented at the 2011 DoD Environmental Monitoring &amp; Data Quality Workshop (EMDQ 2011), 28 Mar ? 1 Apr, Arlington, VA. U.S. Government or Federal Rights License</b>					
14. ABSTRACT					
15. SUBJECT TERMS					
16. SECURITY CLASSIFICATION OF:			17. LIMITATION OF ABSTRACT <b>Same as Report (SAR)</b>	18. NUMBER OF PAGES <b>20</b>	19a. NAME OF RESPONSIBLE PERSON
a. REPORT <b>unclassified</b>	b. ABSTRACT <b>unclassified</b>	c. THIS PAGE <b>unclassified</b>			

# What is EPA doing?

EPA CIO Policy 2105.0, May 2000, (formerly EPA Order 5360.1) only addressed environmental data collection and technology.

- EPA CIO Policy 2106.0, October 2008, expands quality assurance practices into Agency products and services.
- Policy 2106.0 was then clarified in December 2010 to specifically apply to products and services involving environmental data collection, production, and use.



# What is EPA doing?

- These existing documents will be removed:
  - EPA Requirements for Quality Management Plans (QA/R-2)
  - EPA Requirements for Quality Assurance Project Plans (QA/R-5)
- Which are supported by these guidance documents:
  - EPA Guidance for Quality Management Plans (QA/G-2)
  - EPA Guidance for Quality Assurance Project Plans (QA/G-5)

# What is EPA doing?

- EPA will adopt two *Quality Management Standards for Environmental Data Collection, Production, and Use*:
  - CIO Standard 2106-S-01 for use by EPA Organizations
  - CIO Standard 2106-S-02 for use by non-EPA Organizations
- These will be supported by two new guidance documents:
  - QA/G-2A: Guidance for Quality Management Plans
  - QA/G-5A: Guidance on Quality Assurance Project Plans



# Who Needs QA?



# Who Needs QA?





# What Problems Will These Standards Resolve?

- Updated and clearer requirements
  - Expanded to include models, data from external sources, IT sources
  - Expanded to apply to all external agreements
- Replace QA/R-2 and QA/R-5 for non-EPA organizations
  - R-2 and R-5 requirements found non-enforceable
  - Limited use is permitted for existing agreements



# Insufficient Information

E   AE   AOA

# Content of G-2A

- The G-2A document will provide guidance on:
  - Quality Management Plan (QMP) preparation, submission, review, approval, and content
  - Quality management requirements
  - Personnel, external agreements, and records management
  - Use of planning, data acquisition, verification and validation
  - Use of a combined QMP/QAPP



# Who Needs QA?





# Content of G-5A

QA/G-5A will provide guidance on:

- Reminder/Check-list of QAPP essential elements
- **USE OF THE GRADED APPROACH**
- QAPP elements for the collection of data by direct measurement
- QAPP elements for evaluating the use of existing data from other sources (secondary use of data)
- QAPP elements for evaluating models
- Relationship of G-5A to the UFP-QAPP

# Who Needs QA?





# What's New in G-5A

The new G-5A document improves on existing guidance specifically regarding:

- More comprehensive consideration of the use of data from existing sources
- An improved section on developing, evaluating, and using models
- “What-if” considerations



# Sufficient Information

TH GRDD PPRCH

TH<sub>e</sub> GR<sub>a</sub>D<sub>e</sub>D<sub>e</sub> <sub>a</sub>PPR<sub>o</sub>aCH

# G-5A and the UFP-QAPP

## Similarities:

- A QAPP THAT COMPLIES WITH THE UFP-QAPP REQUIREMENTS COMPLIES WITH THE NEW STANDARDS
- Overall structure similar to R-5/G-5 and to the UFP-QAPP
- More attention to linking Project Quality Objectives to Measurement Performance Criteria
- Emphasis on documentation of criteria used for data collection and analysis
- Cross-references between documents

# G-5A and the UFP-QAPP

## Differences:

- G-5A wider in extent of coverage, but UFP-QAPP will be deeper in some sample analysis areas
- G-5A must cover the needs of Agency-wide data collection
- UFP-QAPP more suited to meet the needs of CERCLA, RCRA, and Federal Facilities



# Who Needs QA?



# Working Together: G-5A & UFP-QAPP

- Goal #1: Eliminate inconsistencies
  - Share information during writing
  - (Ed & Kelly's phone bill is skyrocketing)
- Goal #2: Share terminology as much as possible
  - Cross-reference each other's terms
  - (Ed has terminology sticky notes all over his office)
- Goal #3: Make switching between guidance easy
  - Provide Matrix/cross-walk (included in G-5A)
  - (Kelly updates the matrix every time the UFP-QAPP optimization committee recommends blending worksheets)



# G-2A & G-5A Timeline

## G-2A:

- G-2A currently under internal review
- Broader review draft of G-2A expected mid-May

## G-5A:

- Working draft G-5A expected early May
- Broader review draft of G-5A expected mid-June



# Who Needs QA?

